

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

INTERNATIONAL BROTHERHOOD OF
TEAMSTERS AIRLINE DIVISION,

Plaintiff,

Case No. 2:10-cv-00203-LA

v.

FRONTIER AIRLINES, INC. and
REPUBLIC AIRWAYS HOLDINGS, INC.,

Defendants.

MOTION FOR PARTIAL STAY AND POSTING OF BOND

Now Come, Frontier Airlines, Inc. and Republic Airways Holdings, Inc. (collectively “Defendants”) pursuant to Rule 62(c) of the Federal Rules of Civil Procedure, and respectfully request that pending Defendants’ interlocutory appeal contemporaneously noticed this date, the Court stay that part of the Preliminary Injunction entered on April 20, 2010 requiring Defendants to immediately reinstate the group of nineteen (19) mechanic and related employees who elected to relocate to Milwaukee on or shortly after February 24, 2010 as Republic employees to their former status as IBT-represented Frontier employees.

Additionally, if the above partial stay is granted, pursuant to Rule 65(c) of the Federal Rules of Civil Procedure and Section 7 of the Norris LaGuardia Act, 29 U.S.C. § 107, Defendants respectfully request that Plaintiff International Brotherhood of Teamsters Airline Division be required to post a security bond in the amount of \$50,000 covering Defendants’ estimated attorneys’ fees handling the interlocutory appeal. If the partial stay is not granted, Defendants request that this bond be increased to \$75,000 covering any additional restitution that

would arguably be owed by Defendants to comply with the Court's Preliminary Injunction.

Defendants' argument and calculations in support of these requests are more fully set forth in the accompanying Memorandum of Law.

Dated this 25th day of May, 2010

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s/ Brian E. Cothroll

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